

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
V.)	CASE NO: 2:07-CR-244-MHT
)	
DONNA D. ENGLAND)	

UNOPPOSED MOTION TO CONTINUE

NOW COMES the Defendant, **Donna England**, by and through the undersigned counsel, Christine A. Freeman, and pursuant to 18 U.S.C. § 3161(h) respectfully moves this Court to move this matter from the March 17, 2008 trial docket. In support of this motion, Mrs. England would show that such continuance will serve the ends of justice, in that failure to grant a continuance would deny counsel for the Defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. See 18 U.S.C. § 3161(h)(8)(B)(iv).

In further support of this Motion, Defendant would also show:

1. Counsel for the government has authorized undersigned counsel to state that the government does not oppose this motion.
2. A continuance is essential to permit time to await a response from the Government on the pretrial diversion request, which was submitted to the government on Mrs. England's behalf on January 10, 2008. As of the date of this motion, that request has not been acted upon.

WHEREFORE, the Defendant respectfully requests that this Motion be granted.

Respectfully submitted,

s/Christine A. Freeman
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CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Jerusha Adams, Esq., Assistant United States Attorney, 131 Clayton Street, Montgomery, AL 36104.

s/Christine A. Freeman
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